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11 *Jadoo TV, Inc. and Sajid Sohail*

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DISH NETWORK L.L.C.,

Case No. 2:18-cv-09768-FMO-KS

Plaintiff,

**SUPPLEMENTAL DECLARATION OF
SAJID SOHAIL IN SUPPORT OF
MOTION TO TRANSFER VENUE TO
THE NORTHERN DISTRICT OF
CALIFORNIA**

vs.

JADOOTV, INC., SAJID SOHAIL,
HASEEB SHAH, EAST WEST AUDIO
VIDEO, INC., and PUNIT BHATT,

Date: March 12, 2020

Defendants.

Time: 10:00 am

Courtroom: 6D

Judge: Honorable Fernando M. Olguin

I, Sajid Sohail, declare the following:

1. I am one of the named defendants in the above-entitled action. This declaration is based on my own personal knowledge. If called to testify, I could and would do so competently as to the matters set forth herein. I make this declaration in support of the pending Motion to Transfer Venue to the Northern District of California.

2. JadooTV has operated at a loss for the past several years. While the company has stabilized enough to lift the bankruptcy stay in this action, it is still losing money.

3. JadooTV's sales to retailers in the Northern and Eastern Districts of California account for roughly 65% of its total California sales, while its sales to retailers in the Central and Southern Districts of California account for the remaining 35% of its total California sales. California as a whole is not

1 JadooTV's leading sales market. Most JadooTV resellers in the Central District of California are very small
2 or very recent additions. Some of those resellers have never been sold any JadooTV devices.

3 4. JadooTV currently anticipates calling at least six resellers of JadooTV products as
4 witnesses at trial. Each of these resellers lives and works in the Northern District of California:

5 • Mohammad Essa (based in Sacramento);
6 • Onkar Singh (based in Fremont);
7 • Qais Nuristani (based in Carmichael);
8 • Masood Walizada (based in Sacramento);
9 • Tamim Mojadadi (based in Concord); and
10 • Wahidullah Safi (based in Fremont).

11 5. JadooTV has made sales to East West Audio Video, Inc. since at least 2010. A true and
12 correct copy of JadooTV's sales records to the company is attached here as **Exhibit 1**. I have personally
13 been to the East West Audio Video store in Artesia, CA exactly once, on or around February 3, 2017. A
14 copy of my flight confirmations for that trip is attached as **Exhibit 2**. Photos from that trip are attached as
15 **Exhibit 3**. At that meeting, Punit Bhatt remarked that he was glad to finally meet the founder of JadooTV.
16 That is the only time I met Mr. Bhatt. I did not visit the store at the end of 2015, as he has claimed.

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18 Dated: February 27, 2020

/s/ Sajid Sohail

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